

Fill in this information to identify the case:

Debtor 1 Donald J. Kosakowski
Debtor 2 Muriel A. Kosakowski
(Spouse, if filing)
United States Bankruptcy Court for the: Western District of Pennsylvania
(State)
Case number 17-23484-GLT

FORM 4100R

Response to Notice of Final Cure

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, not individually but as Trustee for Pretium Mortgage Acquisition Trust

Court claim no. (if known):

2

Last four digits of any number you use to identify the debtor's account: 4201

Property Address: 619 Ascension Drive
Number Street

West Mifflin, PA 15122
City State Zip Code

Part 2: Prepetition Default Payments

Check one:

☒ Creditor agrees that the debtor(s) have paid in full amount required to cure the prepetition default on the creditor's claim.

☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as the date of this response is:

\$ _____

Part 3: Postpetition Mortgage Payment

Check one:

☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is on: 04/30/2023
MM / DD / YYYY

☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total Postpetition ongoing payments due: (a) \$ _____
- b. Total fees, charges, expenses, escrow, and costs outstanding: +
(b) \$ _____
- c. Total. Add lines a and b. (c) \$ _____

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

 / /
MM / DD / YYYY

Debtor 1 Donald J. Kosakowski

Case Number (if known)

17-23484-GLT

First Name

Middle Name

Last Name

Part 4: Postpetition Mortgage Payment

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received:
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this Notice is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

X /s/ Michael Clark Date 12/15/2022
Signature

Print: Michael Clark Title Bankruptcy Attorney
First name Middle Name Last name

Company RICHARD M. SQUIRE & ASSOCIATES, LLC

If different from the notice address listed on the proof of claim to which this response applies:

Address 115 West Avenue, Suite 104,
Number Street

Jenkintown, PA 19046
City State Zip Code

Contact phone (215) 886-8790 Email: mclark@squirelaw.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re: Donald J. Kosakowski and Muriel A. Kosakowski

Debtors

Chapter: 13

Bankruptcy No.: 17-23484-GLT

11 U.S.C. § 362

Wilmington Savings Fund Society, FSB, d/b/a Christiana
Trust, not individually but as Trustee for Pretium
Mortgage Acquisition Trust

Movant

vs.

Donald J. Kosakowski and Muriel A. Kosakowski

Debtors

and

Ronda J. Winnecour, Esquire

Trustee

RESPONDENTS

CERTIFICATE OF SERVICE

I hereby certify that I am over 18 years of age; and that service upon all interested parties, indicated below, was made by sending true and correct copies of the Response to Notice of Final Cure electronically and/or via First Class Mail, postage prepaid.

Date Served: 12/15/2022

Ronda J. Winnecour, Esquire
Chapter 13 Trustee
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219

United States Trustee
Office of the United States Trustee
Liberty Center
1001 Liberty Avenue, Suite 970
Pittsburgh, PA 15222

Donald J. Kosakowski
619 Ascension Drive
West Mifflin, PA 15122

Muriel A. Kosakowski
619 Ascension Drive
West Mifflin, PA 15122

Daniel P. Foster
Foster Law Offices
PO Box 966
Meadville, PA 16335

I hereby certify the foregoing to be true and correct under penalty of perjury.

Respectfully submitted,

/s/ Michael Clark

Richard M. Squire, Esq. (PA I.D. # 04267)

M. Troy Freedman, Esq. (PA I.D. # 85165)

Michael J. Clark, Esq. (PA I.D. # 202929)

One Jenkintown Station, Suite 104

115 West Avenue

Jenkintown, PA 19046

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